

To the Federal Communications Commission

In the matter of RM-10620:

I wish to express my opposition to the adoption of the petition for proposed rule making submitted by Mr. Dale Reich, K8AD RM-10620, for the following reasons.

1. Although the number of Novice Class licensees has continued to decline, this decline has been more than offset by the number of successful Technician Class licensees. With the plethora of volunteer examination opportunities, except in isolated rural areas, and the variety of available study materials for the Technician Class examination including published question pools, there is more than ample opportunity for anyone who chooses to obtain VHF privileges through the successful completion of a Technician examination. The large number of successful applicants for this class of license demonstrates that this is occurring. To me, this would preclude any need for automatic upgrading of Novice licensees to the Technician Class simply on the basis of longevity in a particular license class.

The Commission had an opportunity to do this when the Amateur Radio Service licensing system was restructured but chose not to. I agree with the Commission's decision on this matter.

2. With respect to the automatic upgrading of those holding the amateur Advanced Class license. Again, numbers indicate that the current licensing system has not been a deterrent to those who chose to upgrade to Extra Class from a lower class license.

In fact, the contrary is true. Numbers indicate a significant increase in those upgrading to the amateur Extra Class license since the Commission restructured the licensing system. As indicated in number 1 above, there are ample opportunities for those who choose to upgrade from Advanced class to the amateur Extra Class license.

Additionally, the former Advanced Class license examination, in my opinion, was much more rigorous than the current amateur Extra Class examination. Those who hold an Advanced Class license have demonstrated they have the capability to pass the current amateur Extra examination except where a disability may have ensued since their acquiring the Advanced license. Except for the rarest of cases, the Commission has adopted rules for accommodating disabled applicants which would mitigate this to a large extent.

In conclusion, I feel Mr. Reich has presented no facts or compelling reasons for changes in the current amateur radio service licensing structure. I would urge the Commission's refusal to adopt this proposed rule change.

Thank you for considering my comments on this matter.

Sincerely,

Paul J. Graziani W5ZK

